

JUSTIFICATION AND APPROVAL  
FOR AN EXCEPTION TO FAIR OPPORTUNITY

1. Contracting Activity: Department of Veterans Affairs (VA)  
Office of Acquisition Operations  
Technology Acquisition Center  
260 Industrial Way West  
Eatontown, New Jersey 07724
  
2. Description of Action: The proposed action is for a Firm-Fixed-Price (FFP) Task Order (TO) to be issued under the National Aeronautics and Space Administration (NASA) Solutions for Enterprise-Wide Procurement (SEWP) IV Government Wide Acquisition Contract (GWAC) for renewal of enterprise-wide maintenance support for the existing CA Technologies Identity and Access Management (IAM) software solution used by the VA Enterprise. The period of performance for this effort will consist of one 12-month base period with two 12-month option periods.
  
3. Description of the Supplies or Services: VA, Office of Information and Technology (OIT), Enterprise Systems Engineering (ESE) has a requirement for ongoing annual maintenance and support of existing CA Technologies IAM software used by the VA Enterprise. CA Technologies software products are used for VA's IAM software solution and Personal Identity Verification (PIV) services. The CA Technologies software licenses have been previously procured. The renewal of maintenance and support is critical for VA Enterprise to obtain software updates and other necessary maintenance functions. This proposed action shall provide maintenance and support services for the existing CA Technologies licensed IAM software products. This support and maintenance shall consist of all manufacturer-released software updates, patches and versions for the existing installation. Additionally, the support and maintenance shall also include access to the manufacturer's approved support resources such as help desk and consultation services for the purpose of resolving problems, issues, and questions concerning the existing installed software. The CA Technologies IAM software is the customized proprietary solution which eases the burden on the organization to administer identities over time. The IAM solution solves two main functions: administration and real-time enforcement. The identity management solution addresses VA enterprises' need to administer (create, modify and delete) user accounts, user profiles and access policies across the heterogeneous VA IT environment via a combination of user roles and business rules. Also included as part of administration activities is the capability to abstract and automatically correlate data. These services support centralized management of identities, where administrative roles can selectively adjust identity relationship and identity traits for entities or groups. CA software defines an administrative role as any role which can modify non-administrative roles, such as adding or removing a user record or adding or removing an actual user. These services support monitoring of decentralized events that relate to identities, where end points are monitored for identity related adjustments and those monitored events are then reported to the centralized system as an input to determine

any subsequent changes that may be required in the scope of identity lifecycle management.

4. Statutory Authority: The statutory authority permitting an exception to fair opportunity is Section 41 U.S.C. 4106(c) as implemented by the Federal Acquisition Regulation (FAR) Subpart 16.505(b)(2)(i)(B), entitled "Only one awardee is capable of providing the supplies or services required at the level of quality required because the supplies or services ordered are unique or highly specialized."

5. Rationale Supporting Use of Authority Cited Above: Based on market research, as described in paragraph eight of this document, it was determined that limited competition is viable among authorized resellers for this requirement. VA licensed and deployed a highly customized installation of a proprietary software solution from CA Technologies for IAM functionality at an enterprise level. CA Technologies IAM is a highly configurable software suite of products in a complex application environment that has been modified and upgraded on a regular basis to support the IAM capability. Only CA Technologies, the customized integrator, has the knowledge and expertise to maintain and support its integrated IAM suite of software products. CA Technologies is the only qualified source that can provide the services as described above. The CA Technologies IAM software suite is proprietary to CA Technologies and access to the proprietary CA Technologies source code for VA owned software licenses is required in order to provide the needed software maintenance and support, including software patches, versions, updates and help desk support which is critical to ensuring that the CA software is functioning properly within the VA enterprise environment. CA Technologies and its authorized resellers are the only source which can provide maintenance, updates, patches and new versions of its proprietary CA Technologies IAM software; thus no other vendor would be capable of meeting the Government's requirements.

6. Efforts to Obtain Competition: Market research was conducted, details of which are in the market research section of this document. This effort did not yield any additional sources that can meet the Government's requirements. It was determined however that limited competition is viable among authorized resellers for this brand name service. In accordance with FAR 5.301 and 16.505(b)(2), this action will be synopsisized at award on the Federal Business Opportunities Page (FBO) and the justification will be made publicly available.

7. Actions to Increase Competition: In order to remove or overcome barriers to competition in future acquisitions for this requirement, the program office will continue to perform market research to ascertain if there are changes in the marketplace that would enable future actions to be competed.

8. Market Research: In March 2013, market research was conducted by the Government's technical experts via internet research and review of industry publications to identify if there are other service providers or IAM software vendors products capable of providing similar capabilities. Market research revealed that Hewlett-Packard, BMS

and IBM/Tivoli offer similar IAM solutions but they cannot meet VA's needs because their source code and technical data cannot support VA's Identity and Access management requirements. None of those products has the breadth of the IAM integrated solution or can offer results comparable to CA Technologies IAM software solution since the CA Technologies solution has been highly customized over the past four years. Additionally, none of these sources can provide the aforementioned maintenance support without the required proprietary source code and technical data. The current CA technologies IAM solution is the System of Systems (SoS) which consists of several subsystems integrated with proprietary data and source code owned by CA technologies. The CA SoS IAM solution will not interface with any other vendors' IAM solutions. Any other vendor IAM solution would require development of System of Systems level interfaces using proprietary programming codes to integrate all subsystems of their IAM products, as none of these other solutions are based on Commercial-Off-The-Shelf (COTS) plug and play type of Software product suites. The use of any other IAM software product will severely degrade the ability to support and manage the existing IAM capability which would result in interoperability and compatibility issues. Any IAM solution from other vendors would require extensive and complex redesign, development and integration of a new VA enterprise-wide IAM solution. Any alternate solution from any other vendor would be a very costly, time consuming and high risk alternative as it would require developing a proprietary IAM solution working through the cradle-to-grave software development life cycle to create a VA IAM solution. The impact would be a complete redesign of the VA IAM and PIV solution which would take a year to complete and cost approximately \$15,000,000.00. The current system would still need to be up and available while redesigning the new system resulting in unnecessary duplication of costs and possible system downtime and/or loss or degradation of data as the system migrated. It would involve other departments as the access points for user data may change impacting departments such as: Active Directory integration; National Performance Matrix reporting; Office of Management and Budget (OMB) daily/weekly/monthly/yearly reporting; and DoD/VA integration of providers. Based on this market research, only CA Technologies software suite of products can meet all of VA's needs.

Market research was conducted in April 2013 utilizing the NASA SEWP IV GWAC Product Verification and Manufacturer Lookup tool and it was determined that there are 30 authorized resellers of the CA Technologies licenses and maintenance support that are current NASA SEWP IV contract holders. In addition, a Request for Information (RFI) was posted on NASA SEWP IV website in which five responses were received. Of the five responses, one respondent was a Value Added Reseller from Group A (Four Points), one respondent was a Service Disabled Veteran Owned Small Business from Group B (Three Wire), one respondent was a Small Business from Group C (Merlin) and two respondents were Other Than Small Businesses from Group D (Immix Group and Iron Bow). No responses were received from the remaining NASA SEWP IV contract holders. Therefore, sufficient competition is expected among small business for this requirement, and as such, the solicitation will only be issued to Group B and Group C contract holders on the NASA SEWP IV GWAC.

9. Other Facts: None